



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

June 10, 2010

US EPA RECORDS CENTER REGION 5



422186

Mr. Bryan Stone
AMEC Geomatrix, Inc.
510 Superior Avenue, Suite 200
Newport Beach, CA 92663-3627

Re: LPC # 1198010003 - Madison County
Hartford/Chemetco, Inc.
Approval of Revised Final Demolition Plan for the
Former Foundry and Tank House Buildings and American Air Filter System

Dear Mr. Stone,

This letter is in response to your revised submittal of the Demolition Plan for the Former Foundry and Tank House Buildings and American Air Filter (AAF) System that Industrial Asset Disposition proposes to undertake at the Chemetco site.

The Illinois Environmental Protection Agency approves the Demolition Plan for the Former Foundry and Tank House Buildings and American Air Filter System provided the following conditions are met:

Introduction, Section 1.0, paragraph 3

Please revise as follows:

~~Although this Demolition Plan is being submitted in the Estate's name as required by the IO, the actual work will be managed by IAD working in close communication with the Estate's on-site personnel.~~ Approval of this Compliance with the Illinois Environmental Protection Agency (Illinois EPA)'s approved Demolition Plan will satisfy IEPA's requirements that "the Trustee shall manage the Facility in accordance with this IO and in accordance with all plans, standards, specifications, and schedules set forth in or developed in work plans approved by the State, pursuant to this IO", without the Estate or Trustee needing to refer to any other previously approved plans to determine whether the demolition work is in compliance with the IO.

Current Site Conditions, Section 2.2, paragraph 2

Please revise to reflect recent progress made to correct deficiencies:

The Site is fenced, monitored and controlled during business daylight hours by Chemetco Estate personnel. After hours and weekend monitoring is achieved by the presence of a 24-hour security camera monitoring system.

Rockford • 4302 N. Main St., Rockford, IL 61103 • (815) 987-7760

Elgin • 595 S. State, Elgin, IL 60123 • (847) 608-3131

Bureau of Land - Peoria • 7620 N. University St., Peoria, IL 61614 • (309) 693-5462

Collinsville • 2009 Mall Street, Collinsville, IL 62234 • (618) 346-5120

Des Plaines • 9511 W. Harrison St., Des Plaines, IL 60016 • (847) 294-4000

Peoria • 5415 N. University St., Peoria, IL 61614 • (309) 693-5463

Champaign • 2125 S. First St., Champaign, IL 61820 • (217) 278-5800

Marion • 2309 W. Main St., Suite 116, Marion, IL 62959 • (618) 993-7200

Current Site Conditions, Section 2.2, paragraph 3

Please revise as follows:

The IO further stated that MBM are considered to be work affected materials (WAM) defined as "scrubber sludge, slag, MBM, wastes, and substances accumulated on the surface of or within the Facility or Facility assets that are managed, handled, or otherwise dealt with in the performance of work under this IO. Consistent with the IO, the definition of WAM will remain the same for the performance of work under this Demolition Plan. However, Illinois EPA has responded with certain exceptions to specific WAM comprised of MBM that requires relocation for work to be performed under this Demolition Plan, i.e. the 90 day time limit for MBM from the Foundry building being relocated to the Fines Building.

Current Site Conditions, Section 2.2, paragraph 5

Please revise as follows:

~~The IEPA has characterized~~ The applicable or relevant and appropriate requirements (ARARs) for the MBM ~~as characteristically hazardous due to the concentrations of lead and cadmium present in the materials. As described in this Demolition Plan and discussed in meetings with IEPA, these materials~~ that will be relocated and staged in the areas presented in this Demolition Plan during the demolition phase to await reprocessing on site are listed ~~As required under the IO, applicable or relevant and appropriate requirements (ARARs) have been developed and included in Table 1 (as revised below) of this Demolition Plan for the management of this and other material and/or debris that will be encountered during the project. Such relocation, staging, or movement of MBM for future on-site reprocessing, including black slag and scrubber sludge, consistent with this Demolition Plan, will not be considered WAM under the IO, and does not trigger any RCRA requirements other than those specified in Table 1 and is, therefore, consistent with the IO.~~

Current Site Conditions, Section 2.2, paragraph 7

Please revise as follows:

While this Demolition Plan does not detail the pending processing activities to recycle MBM, as described more fully below, the MBM present in many areas of the proposed demolition work areas will be collected, consolidated, and temporarily stored on site during the demolition phase to more safely allow many of the former structures to be demolished in preparation for on-site processing activities. ~~The term "consolidated," as used in this Demolition Plan, means to gather and collect like materials from more than one place within a specific building or area, since they need to be relocated, and stockpiled together at a new location on site in order to safely and~~

~~effectively conduct the pending demolition. In general, the MBM that is gathered during demolition will be stockpiled separately from existing piles on site, except for the MBM present within the Dome Building that will be relocated inside the adjacent Dust Injection System (DIS) Building. The scrubber sludge that is broadly dispersed within the Foundry and Tank House Buildings, along with MBM present in the AAF ducting and Bag House structures, will be gathered and safely moved to the Fines Building for temporary storage for future processing MBM relocated to the Fines or DIS Buildings a consistent with this Demolition Plan, and staged for future on-site processing, shall not be considered WAM under the IO. Collection, relocation, and staging of MBM for future processing is discussed further in Section 5.6.~~

Scope of Work, Section 3.1, paragraph 1, bullet point 7
Please revise as follows:

- Inspect, document, and repair as required, the interior walls and floor of the Fines Building and the DIS Building for temporary storage (staging) of MBM ~~for future processing activities that are collected during this work.~~

Scope of Work, Section 3.1, paragraph 1, insert new bullet point between bullet point 7 and 8
Please insert as follows:

- Inspect, document, and repair as required, the interior walls and floor of the Fines Building and the DIS Building for temporary storage (staging) of MBM ~~for future processing activities that are collected during this work.~~
- Consolidate existing MBM within the Fines and DIS Buildings and place them in marked areas as described below and relocate existing MBM from within the Dome Building to the DIS Building as described below.
- Collect, sort, and recycle, or dispose of various types of scrap, debris, and trash located inside and adjacent to the structures proposed for demolition;

Scope of Work, Section 3.1, paragraph 1, bullet point 10 (now 11)
Please revise as follows:

- ~~Collect and containerize scrubber sludge dust from the structures proposed for demolition. This MBM will be temporarily stored (staged) on site in either the Fines Building or DIS Building for future MBM processing activities;~~ Provide safe working conditions and limit the possibility for cross-contamination within the structures proposed for demolition by collecting and relocating existing accumulations of MBM within the structures to be demolished and placing them in the Fines or DIS Buildings.

Scope of Work, Section 3.1, paragraph 1, bullet point 13 (now 14)

Please revise as follows:

- In compliance with NESHAP and the Illinois EPA 10 day notification requirement, remove and abate asbestos containing materials (ACM) and universal wastes that are known to be present in the structures planned for demolition and appropriately dispose of them;

Scope of Work, Section 3.1, paragraph 1, bullet point 16 (now 17)

Please revise as follows:

- Decontaminate, size as necessary, and recycle scrap steel;

Foundry Building, Baghouse and Control Room, and AAF Air Pollution System, Section 3.2, paragraph 5

Please revise as follows:

The Baghouse Control Room is a small cinder block structure with A-frame roof located between the Baghouse and Foundry Building. All the structures described above are proposed for demolition down to slab grade, leaving the concrete floor slabs in place (the condition of the concrete floor slabs will be inspected and documented at the conclusion of the demolition and building decontamination). The Polishing Pits will be left in place until some future date. The buildings proposed for demolition will never be used again for smelting purposes, are in poor condition, and pose a safety hazard. Three of the four furnaces have salvage value and will be removed and sold for reuse in Europe. The footprint currently occupied by these buildings and structures may be needed for purposes of future MBM processing activities.

Regulatory Considerations, Section 4.0, paragraph 1

Please revise as follows:

~~Upon IEPA's approval of this Demolition Plan, all demolition work performed at the Site as described in this Demolition Plan will be considered as being conducted in compliance with the IO since MBM is managed in accordance with this Demolition Plan will not be considered WAM.~~

General Recordkeeping, Section 4.5, paragraph 1
Please revise as follows:

IAD and the Estate will maintain documentation at the Site for all materials shipped or disposed off site, along with the approximate quantity of MBM that is collected, relocated, or consolidated ~~and staged for future processing~~. Documentation maintained on file will include:

General Recordkeeping, Section 4.5, paragraph 1, additional final bullet point
Please insert an additional bullet point as follows:

- The condition of the concrete floor slabs shall be photo documented prior to demolition, as well as after demolition.

Storm Water Management, Section 5.2, paragraph 3
Please revise as follows:

Water that may accumulate within the AAF area during demolition is presently removed via the Main Pump House and either transferred to the former cooling canals or directed to spray irrigation for purposes of evaporation and volume control. Once demolition starts, spray irrigation for volume control will likely cease and any water removed from the AAF area via the AAF collection sump will be transferred to the Main Pump House and conveyed to the existing cooling canals on the north side of the Site. If water levels are high in the cooling canals when water may need to be diverted there, it may be necessary to pump water from the cooling canal directly into the perimeter system at the northeast corner of the Site. If additional temporary storage capacity is required, the water from the AAF area may be diverted to the former slag granulation barge located northeast of the AAF area. This location will be depicted on Figures 2-5.

Other Hazardous Materials Collection, Section 5.4.3, paragraph 2
Please revise as follows:

An existing 90-day hazardous waste storage and accumulation area used during former Site operations is located in a small building adjacent to the Receiving Building. During demolition activities, this area may be used for hazardous materials collection during "lab-packing" activities. The contractor will delineate a storage area for collected hazardous materials that will be identified by demarcation tape and orange traffic delineators. All waste materials collected will be catalogued in a file that will contain completed manifests, material type and quantity disposed, recycling records, and certificates of disposal as applicable. Hazardous wastes disposed of under this Demolition Plan will assume the Estate is the generator and will use their existing EPA ID number. The catalog list will be provided as part of closeout documentation to

IEPA at the completion of the demolition work. Because there is a pending CERCLA action for the Site, this accumulation and storage area does not require a permit and the RCRA storage provisions do not apply. However, the requirements of 35 Ill. Adm. Code 724.101(j) do apply.

Former Smelter Feedstock, Section 5.4.4, paragraph 1

Please revise to acknowledge understanding that the demolition cannot proceed while these materials remain in the Foundry Building.

Raw product materials that were received by the Site prior to shutdown are present within the Foundry Building. These materials were intended for smelting and include, among other things, items such as chipped circuit boards and Tin Dross. The former furnace feed materials that cannot be processed on-site during pending metals processing work will be transferred to DOT-approved shipping containers inside the Foundry Building during the performance of debris collection activities. Heavy equipment such as a Bobcat, fork lift, and/or a backhoe will be used during the transfer of these materials to new containers. The material transfer work area will be dry and free of other MBM. After transfer is complete, any residual feedstock material associated with the transfer will be swept or vacuumed up and placed within the shipping container. These repackaged materials will be sealed and labeled and will remain temporarily stored inside the Foundry Building until they are shipped off site to yet-to-be-determined buyers of smelter feedstock materials such as these. Usual and appropriate notifications will be made by the Estate under existing procedures prior to off-site shipment of any facility assets.

Wet Decontamination Facility, Section 5.5.3, paragraph 1

Please revise as follows:

A large contained decontamination pad will be established inside the southern half of the former Dome Building area. The three-sided concrete walled storage area contains a concrete floor and will be used as needed for decontamination of large sections of demolition debris that may require additional cleaning with pressure washers. The steel roof of the Dome Building will initially be removed for safety purposes. Once the steel roof is removed, MBM present within the DIS Building will be pushed into a stockpile towards the interior walls to create additional available space for storage of all materials to be relocated from the Dome Building. ~~It is anticipated that~~ This material handling step will be performed utilizing a rubber tired loader. After the space is made available, the floor area will be inspected and conditions will be documented. ~~If necessary,~~ Any cracks in the DIS Building floor, including those that penetrate the full slab thickness, will be sealed prior to relocation to the DIS Building of Dome Building MBM. All existing piles of scrubber sludge and slag fines present in the Dome Building will then be relocated utilizing similar equipment into the adjacent DIS building for storage. This MBM will be stored under cover (staged) within the DIS Building until subsequent on-site processing can be performed at a later date. Once material is consolidated there, the building will be

inspected weekly for physical damage and escape of consolidated material and repaired as required.

Collection and Consolidation of Scrubber Sludge Dust MBM Within Buildings to be Demolished, Section 5.6, paragraph 1

Please revise as follows:

Large accumulations of scrubber sludge dust generated from former smelting operations and other MBM are present throughout the interior surfaces of the Foundry and Tank House Buildings and the interior ducting of the Baghouse and AAF. The dust is very fine grained and poses an inhalation hazard to construction personnel. Efforts will be made to collect as much of this material as possible prior to performance of abatement and/or demolition so as to minimize potential hazards to Site workers and also to minimize generation of fugitive dust emissions during demolition. Personnel handling scrubber sludge dust capable of becoming airborne will wear Level C PPE during collection and consolidation activities.

Collection and Consolidation of Scrubber Sludge Dust MBM Within Buildings to be Demolished, Section 5.6, paragraph 7

Please revise as follows:

IAD will enclose the open end of the Fines Building with a wooden frame covered with corrugated fiberglass siding or other like material, to provide additional containment and protection from the elements. In addition, the new wall would contain a doorway to allow access of construction equipment, and a small rounded asphalt curb would be placed on the slab across the doorway to prevent potential storm water run on from entering the building. Prior to the relocation of any MBM to the Fines Building, the building and floor slab will be inspected and documented. Any existing cracks, including those that fully penetrate the interior floor slab down to the underlying soil, will be sealed prior to placement of any MBM there. Building walls will be patched as necessary to repair any tears or damage to the sheet metal skin. All repairs will be documented. Once material is consolidated there, the building will be inspected weekly for physical damage and escape of consolidated material and repaired as required.

AAF Decontamination Area and Sump, Section 5.7, paragraph 2, item 4

Please revise as follows:

1. Pressure wash the AAF decontamination area and sump three times, collect all wash waters, and transfer to temporary water storage tank in the Decontamination Area. The slab wash water will be stored in compliance with 35 Ill. Adm. Code 724.101(j) for reuse with other decontamination liquids for use as slurry make-up water in subsequent processing of MBM at the Site. Determination of whether the

accumulated material and wash water is a RCRA hazardous waste is required under 40 CFR §261.11, as listed in Table 1.

Hazardous Building Materials Survey, Section 5.9, paragraph 3
Please revise as follows:

LBP was identified on surfaces within the Foundry Building. HHW, or universal wastes, were identified within the Foundry and Tank House Buildings. Examples of universal wastes identified within the Foundry and Tank House Buildings and AAF included fluorescent lights, polychlorinated biphenyl (PCB) light ballasts, mercury thermostats, paints, various bulbs, transformers, air conditioning units, and other materials. Mercury switches and fluorescent bulbs identified in the survey (Geotechnology, 2009) will be managed as universal wastes. These materials will be handled, managed, and properly disposed of following 35 IEPA Regulations 35 III IAC 733, Subparts B and D. Geotechnology, Inc. assumed that each light ballast identified was intact, non-leaking, and PCB-containing. Any leaking and/or damaged PCB ballast will be managed as a special waste and pursuant to TSCA 40 CFR 761. Non-leaking PCB light ballasts will be managed as a municipal solid waste following 35 IAC, Subtitle G. No suspect materials were identified in the Bailer Hydraulic Room or the Restroom Building. Oil within the furnace hydraulic systems in the Foundry Building was sampled and analyzed for the presence of PCBs by EPA Method 8082. No PCBs were detected in the oil.

Tank House Building Interior Demolition, Section 6.7, paragraph 2
Please revise as follows:

~~Contaminated concrete, as based on visual observation (stained or discolored), will be placed in a temporary stockpile for waste profiling purposes. Concrete that does not appear to be visually impacted will be placed in a separate pile.~~ The concrete liners removed as part of the Tank House demolition will be placed in containers for waste profiling purposes. Waste exhibiting a characteristic of a hazardous waste in 35 III Adm. Code 721, must be managed in accordance with 35 III. Adm. Code 722, 723, 728, and 809. Representative samples of each pile container will be obtained and analyzed separately for total and TCLP metals for waste profiling purposes prior to shipment off site for recycling or disposal. Analytical results will be relayed to IEPA personnel via telephone for approval to ship concrete off site. Concrete debris with analytical results that are below the TACO Tier 1 Industrial/Commercial Standards for soils may be left in a pile on site for future use as clean fill.

Comment Section, number 26. Sections 3.3 and 6.7:
Please revise as follows:

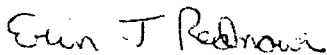
*The proposed demolition plan for the Black Acid Tank
Solid Waste Management Unit (SWMU) should meet the substantive requirements
for closure under the Resource Conservation and Recovery Act (RCRA).*

AMEC Response: Closure activities will be performed, in parallel with other demolition work that will be on-going at the Site under the Demolition Plan, in compliance with 40 CFR §265.197 Closure and Post-Closure Care. This work will be documented as fulfilling the substantive requirements of closure and submitted as part of the post-demolition completion report.

The interior of the Black Acid Tank was decontaminated although written verification of this step cannot be found at this time. Chemetco submitted a revised soil sampling plan on September 2, 2000, although it is not clear if the IEPA ever approved the plan. ~~The Estate will prepare a closure work plan for submittal to IEPA for review.~~

Please submit a revised plan which incorporates the conditions set forth above. If there are any questions concerning the above, please do not hesitate to contact me at 217-785-8725.

Sincerely,



Erin J. Rednour, Project Manager
National Priorities List Unit
Federal Sites Remediation Section
Bureau of Land
Illinois Environmental Protection Agency